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## BEFORE THE POSTAL RATE COMMISSION WASHINGTON, D.C. 20268-0001

POSTAL RATE AND FEE CHANGES
PURSUANT TO PUBLIC LAW 108-18

Docket No. R2005-1

NOTICE OF THE UNITED STATES POSTAL SERVICE OF REVISED RESPONSE OF WITNESS KAY
TO INTERROGATORY OF ADVO, INC. (ADVO/USPS-T18-1) --ERRATA
(June 24, 2005)

The United States Postal Service hereby provides a revised first page of the response of witness Kay to the following interrogatory of Advo, Inc., filed on May 16, 2005: ADVO/USPS-T18-1. The attached page replaces the one filed May 31. The change is on the third line from the bottom, where 7,727 is changed to 7,427.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr. Chief Counsel, Ratemaking

Eric P. Koetting

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260-1137 (202) 268-2992, FAX -3084 June 24, 2005

## Response of United States Postal Service Witness Nancy R. Kay To Interrogatory by ADVO, Inc.

**ADVO/USPS-T18-1.** LR-K-71 states that the input data for your Rural Carrier Mail Count Data come from two sources. FY2003.RURFLAT.dat is a text file containing the rural carrier mail count evaluation for each route as of FY 2003 PQ 4. It contains 69,318 observations. FY2004.RURFLAT.dat is a text file containing the rural carrier mail count evaluation for each route as of FY 2004 PQ 4. It contains 70,212 observations.

- (a) The USPS FY04 Annual Report states that there were 61,611 full-time rural carriers in FY03 and 62,762 full-time rural carriers in FY04. Your two data files appear to be a 100% census of all National Mail Count data taken in each of the two years. If this is not correct, please explain fully.
- (b) What portion of total rural carriers was counted in FY03 and FY04?
- (c) Please state when the National Mail Count shape and processing/handling definitions changed to be consistent with those of the DMM/RPW.
- (d) Please identify the time periods over which the FY03 and FY04 National Mail Counts were taken.

## **RESPONSE**

(a) The National Mail Count (NMC) data for FY 2003 contains the most current evaluation for each rural route as of PQ4 FY 2003. The NMC data for FY 2004 contains the most current evaluation for each rural route as of PQ4 FY 2004. The FY 2003 NMC data file includes 48,558 routes where the evaluation is marked as taking place in 2003. The FY 2004 NMC data file includes 45,302 routes where the evaluation is marked as taking place in 2004.

Please note that the FY2003.RURLFLAT.DAT includes 61,605 evaluated routes, 7,698 auxillary routes, and 15 mileage routes.

FY2004.RURLFLAT.DAT includes 62,773 evaluated routes, 7,427 auxillary routes, and 12 mileage routes. Auxillary routes are evaluated at less than 39 hours a week, and are thus not considered full time routes.

REVISED: JUNE 24, 2005

## **CERTIFICATE OF SERVICE**

I hereby certify that I have this date served the foregoing document in accordance with Section 12 of the Rules of Practice and Procedure.

Eric P. Koetting

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260-1137 (202) 268-2992, FAX: -5402 June 24, 2005